

Remarks

Reconsideration of this application as amended is respectfully requested.

Claims 1-7, 9-14, 16-21, and 23-25 stand rejected under 35 U.S.C. §102(b) as being unpatentable over U.S. Patent no. 5,581,797 of *Baker et al.* ("*Baker*").

Claims 1, 8, 11, 13, 15, 20, and 22 stand rejected under 35 U.S.C. §102(b) as being unpatentable over U.S. Patent no. 5,929,863 of *Tabei et al.* ("*Tabei*").

Applicant respectfully submits that amended claim 1 is not anticipated by *Baker* because *Baker* does not disclose a method for generating a pixel-oriented graph as claimed in amended claim 1. For example, *Baker* does not disclose a set of pixel blocks in which each pixel value visually represents a value of a variable as claimed in amended claim 1. Instead, *Baker* discloses a set of geometric shapes in which the area of each geometric shape represents the number of lines of code a corresponding subsystem of a hierarchical software system. (*Baker*, col. 4, lines 43-45 and 57-60). It is submitted that a geometric shape having an area that visually represents lines of code as taught by *Baker* does not anticipate a pixel value that visually represents a value of a variable as claimed in amended claim 1. *Baker* uses areas of geometric shapes to visually convey information rather than use pixel values to visually convey information as claimed in amended claim 1.

Moreover, *Baker* does not disclose a visual boundary that represents an aggregate of the values of a variable depicted in a pixel-oriented graph as claimed in amended claim 1. This follows from the fact that *Baker* does not disclose a pixel-oriented graph as claimed in amended claim 1. Instead, *Baker* discloses a geometric, i.e. visual, shape that represents lines of code in a software subsystem (*Baker*, col. 4, lines 43-45 and 57-60). It is submitted that an aggregate of lines of code in a software subsystem as taught by *Baker* is not an

aggregate of the values of a variable depicted in a pixel-oriented graph as claimed in amended claim 1.

It is therefore respectfully submitted that the method of amended claim 1 that includes a visual boundary for an aggregate of a set of values depicted in a pixel-oriented graph is not anticipated by the teachings of *Baker* which do not include a pixel-oriented graph.

Given that claims 2-12 depend from amended claim 1, it is submitted that claims 2-12 are not anticipated by *Baker*.

It is also submitted that amended claim 13 is not anticipated by *Baker*. Amended claim 13 includes limitations similar to the limitations of amended claim 1. Therefore, the remarks stated above with respect to amended claim 1 and *Baker* also apply to amended claim 13.

Given that claims 14-19 depend from amended claim 13, it is submitted that claims 14-19 are not anticipated by *Baker*.

It is further submitted that amended claim 20 is not anticipated by *Baker*. Amended claim 20 includes limitations similar to the limitations of amended claim 1. Therefore, the remarks stated above with respect to amended claim 1 and *Baker* also apply to amended claim 20.

Given that claims 21-25 depend from amended claim 20, it is submitted that claims 21-25 are not anticipated by *Baker*.

Applicant also submits that amended claim 1 is not anticipated by *Tabei* because *Tabei* does not disclose a method for generating a pixel-oriented graph in which each pixel value visually represents a value of a variable as claimed in amended claim 1. Instead, *Tabei* discloses a distribution graph in which the values of two variables, sales and gross margin, are visually represented by x and y positions of dots on the distribution graph. (*Tabei*, Figure 4 and col. 5, lines 52-62).

Moreover, *Tabei* does not disclose a visual boundary that represents an aggregate of the values of a variable depicted in a pixel-oriented graph as claimed in amended claim 1. This

follows from the fact that *Tabei* does not disclose a pixel-oriented graph as claimed in amended claim 1. *Tabei* discloses a thick frame for selecting dots to convert into data (*Tabei*, Figure 4 and col. 5, line 66 through col. 6, line 12) rather a visual boundary that represents an aggregate of values of a variable depicted in a pixel-oriented graph as claimed in amended claim 1.

Given that claims 2-12 depend from amended claim 1, it is submitted that claims 2-12 are not anticipated by *Tabei*.

Applicant further submits that amended claims 13 and 20 are not anticipated by *Tabei* because amended claims 13 and 20 include limitations similar to the limitations of amended claim 1. Therefore, the remarks stated above with respect to amended claim 1 and *Tabei* also apply to amended claims 13 and 20.

Given that claims 14-19 and 21-25 depend from amended claims 13 and 20, it is submitted that claims 14-19 and 21-25 are not anticipated by *Tabei*.

It is respectfully submitted that in view of the amendments and arguments set forth above, the applicable objections and rejections have been overcome.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 08-2025 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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